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11 Attorneys for Plaintiff  
UNITED STATES OF AMERICA

12 UNITED STATES DISTRICT COURT  
13  
14 FOR THE CENTRAL DISTRICT OF CALIFORNIA

15 UNITED STATES OF AMERICA,

16 Plaintiff,

17 v.

18 DAREN LI,  
aka "Devon,"  
aka "KG-PERFECT,"  
19 aka "RF," and  
YICHENG ZHANG,  
20 aka "Eason,"

21 Defendants.

No. CR 2:24-00311-RGK

STIPULATION REGARDING REQUEST FOR  
(1) CONTINUANCE OF TRIAL DATE AND  
(2) FINDINGS OF EXCLUDABLE TIME  
PERIODS PURSUANT TO SPEEDY TRIAL  
ACT

**CURRENT TRIAL DATE: 7/9/2024**  
**PROPOSED TRIAL DATE: 4/15/2025**

22  
23  
24 Plaintiff United States of America, by and through its counsel  
25 of record, the United States Attorney for the Central District of  
26 California and Assistant United States Attorneys Maxwell Coll and  
27 Nisha Chandran; defendant Daren Li ("defendant LI"), both  
28 individually and by and through his counsel of record, Robert Darren

1 Cornforth; and defendant Yicheng Zhang ("defendant ZHANG"), both  
2 individually and by and through his counsel of record, Deputy Federal  
3 Public Defender James S. Threatt, hereby stipulate as follows:

4 1. The Indictment in this case was filed on May 15, 2024.  
5 Defendant LI first appeared before a judicial officer in this case in  
6 the United States District Court for the Northern District of Georgia  
7 on April 15, 2024, and first appeared in the Central District of  
8 California in this case on May 1, 2024. Defendant ZHANG first  
9 appeared before a judicial officer of the court in which the charges  
10 in this case were pending on May 16, 2024. The Speedy Trial Act, 18  
11 U.S.C. § 3161, originally required that the trial commence on or  
12 before July 24, 2024, for defendant LI, and on or before July 25,  
13 2024, for defendant ZHANG.

14 2. On May 16, 2024, the Court set a trial date of July 9,  
15 2024.

16 3. Defendants LI and ZHANG are detained pending trial. The  
17 parties estimate that the trial in this matter will last  
18 approximately two weeks. All defendants are joined for trial and a  
19 severance has not been granted.

20 4. By this stipulation, defendants LI and ZHANG move to  
21 continue the trial date to April 15, 2025. This is the first request  
22 for a continuance.

23 5. Defendants request the continuance based upon the following  
24 facts, which the parties believe demonstrate good cause to support  
25 the appropriate findings under the Speedy Trial Act:

26 a. Defendants LI and ZHANG are charged with violations of  
27 Conspiracy to Commit Money Laundering, in violation of 18 U.S.C. §  
28 1956(h); and International Money Laundering, in violation of 18

1 U.S.C. § 1956(a)(2)(B)(i). Upon entry of respective protective  
2 orders, the government will produce discovery to the defense,  
3 including thousands of pages of financial documents, photographs,  
4 videos, electronic messages, and written reports, among other files.  
5 The government also seized several electronic devices and is in the  
6 process of translating written and audio messages from Mandarin to  
7 English. The government will produce additional discovery as it  
8 becomes available.

9           b. Defense counsel for defendant LI is presently  
10 scheduled to be in trial as described in Appendix A. Accordingly,  
11 counsel for defendant LI represents that he will not have the time  
12 that he believes is necessary to prepare to try this case on the  
13 current trial date.

14           c. Defense counsel for defendant ZHANG is presently  
15 scheduled to be in trial as described in Appendix B. Accordingly,  
16 counsel for defendant ZHANG represents that he will not have the time  
17 that he believes is necessary to prepare to try this case on the  
18 current trial date.

19           d. In light of the foregoing, counsel for defendants also  
20 represent that additional time is necessary to confer with  
21 defendants, conduct and complete an independent investigation of the  
22 case, conduct and complete additional legal research including for  
23 potential pre-trial motions, review the discovery and potential  
24 evidence in the case, and prepare for trial in the event that a  
25 pretrial resolution does not occur. Defense counsel represent that  
26 failure to grant the continuance would deny them reasonable time  
27 necessary for effective preparation, taking into account the exercise  
28 of due diligence.

1 e. Defendants LI and ZHANG believe that failure to grant  
2 the continuance will deny them continuity of counsel and adequate  
3 representation.

4 f. The government does not object to the continuance.

5 g. The requested continuance is not based on congestion  
6 of the Court's calendar, lack of diligent preparation on the part of  
7 the attorney for the government or the defense, or failure on the  
8 part of the attorney for the Government to obtain available  
9 witnesses.

10 6. For purposes of computing the date under the Speedy Trial  
11 Act by which defendant's trial must commence, the parties agree that  
12 the time period of June 4, 2024 to April 15, 2025, inclusive, should  
13 be excluded pursuant to 18 U.S.C. §§ 3161(h)(7)(A), (h)(7)(B)(i) and  
14 (h)(7)(B)(iv) because the delay results from a continuance granted by  
15 the Court at defendants' request, without government objection, on  
16 the basis of the Court's finding that: (i) the ends of justice served  
17 by the continuance outweigh the best interest of the public and  
18 defendant in a speedy trial; (ii) failure to grant the continuance  
19 would be likely to make a continuation of the proceeding impossible,  
20 or result in a miscarriage of justice; and (iii) failure to grant the  
21 continuance would unreasonably deny defendant continuity of counsel  
22 and would deny defense counsel the reasonable time necessary for  
23 effective preparation, taking into account the exercise of due  
24 diligence.

25 7. Nothing in this stipulation shall preclude a finding that  
26 other provisions of the Speedy Trial Act dictate that additional time  
27 periods be excluded from the period within which trial must commence.  
28 Moreover, the same provisions and/or other provisions of the Speedy

1 Trial Act may in the future authorize the exclusion of additional  
2 time periods from the period within which trial must commence.

3 IT IS SO STIPULATED.

4 Dated: June 4, 2024

Respectfully submitted,

5 E. MARTIN ESTRADA  
United States Attorney

6 CAMERON L. SCHROEDER  
7 Assistant United States Attorney  
Chief, National Security Division  
8

9 /s/ Maxwell Coll  
10 MAXWELL COLL  
NISHA CHANDRAN  
Assistant United States Attorneys

11 Attorneys for Plaintiff  
12 UNITED STATES OF AMERICA

13 //

14 //

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I am Defendant LI's attorney. I have carefully discussed every part of this stipulation and the continuance of the trial date with my client. I have fully informed my client of his Speedy Trial rights. To my knowledge, my client understands those rights and agrees to waive them. I believe that my client's decision to give up the right to be brought to trial earlier than April 15, 2025, is an informed and voluntary one.

R. Darren Cornforth  
Robert Darren Cornforth  
Attorney for Defendant  
DAREN LI

6-11-24  
Date

I have read this stipulation and have carefully discussed it with my attorney. This agreement has been read to me in Mandarin, the language I understand best, and I have carefully discussed every part of it with my attorney. I understand my Speedy Trial rights. I voluntarily agree to the continuance of the trial date, and give up my right to be brought to trial earlier than April 15, 2025.

Daren Li  
DAREN LI  
Defendant

6-11-2024  
Date

**CERTIFICATION OF INTERPRETER**

I, Yanyan Liu, am fluent in the written and spoken English and Mandarin languages. I accurately translated this entire agreement from English into Mandarin to defendant DAREN LI on this date.

Yanyan Liu  
Interpreter

6-11-24  
Date

1 I am Defendant ZHANG's attorney. I have carefully discussed  
 2 every part of this stipulation and the continuance of the trial date  
 3 with my client. I have fully informed my client of his Speedy Trial  
 4 rights. To my knowledge, my client understands those rights and  
 5 agrees to waive them. I believe that my client's decision to give up  
 6 the right to be brought to trial earlier than April 15, 2025, is an  
 7 informed and voluntary one.

8 James S. Threatt  
 9 James S. Threatt  
 10 Deputy Federal Public Defender  
 11 Attorney for Defendant  
 12 YICHENG ZHANG

06/17/2024  
 Date

13 I have read this stipulation and have carefully discussed it  
 14 with my attorney. This agreement has been read to me in Mandarin,  
 15 the language I understand best, and I have carefully discussed every  
 16 part of it with my attorney. I understand my Speedy Trial rights. I  
 17 voluntarily agree to the continuance of the trial date, and give up  
 18 my right to be brought to trial earlier than April 15, 2025.

19 YICHENG ZHANG  
 20 YICHENG ZHANG  
 21 Defendant

06/17/2024  
 Date

**CERTIFICATION OF INTERPRETER**

22 I, Yanyan Liu, am fluent in the written and spoken  
 23 English and Mandarin languages. I accurately translated this entire  
 24 agreement from English into Mandarin to defendant YICHENG ZHANG on  
 25 this date.

26 Yanyan Liu  
 27 Interpreter

6/17/2024  
 Date

**APPENDIX A: LIST OF ATTORNEY OBLIGATIONS**

- United States v. Sun, Case No. 2:24-cr-1007-BTM, a wire-fraud case set for a trial-setting conference on June 24, 2024. Trial is estimated to last five days.
- People v. Hsiao, Case No. 22HF0471, Orange County Superior Court, a kidnapping case set for trial on August 19, 2024, and estimated to last two weeks.
- United States v. Jiang, Case No. 24-CR-187-CLS, a wire-fraud case set for trial on August 27, 2024, and estimated to last five days.

**APPENDIX B: LIST OF ATTORNEY OBLIGATIONS**

- United States v. Qian Guo, Case No. 2:23-CR-00535-SVW, a five-defendant conspiracy to defraud the United States case, which has been pending since October 19, 2023, has been continued one time, and is set for a one-week trial on June 25, 2024. The parties have prepared a stipulation to continue the trial to February 11, 2025.
- United States v. Damian Robert Stanek, Case No. 2:23-CR-00235-DMG, a single-defendant felon in possession of a firearm case, which has been pending since May 31, 2023, has been continued once, and is set for a three-to-four day trial on July 9, 2024. It is unknown at this time whether the parties will seek a continuance.
- United States v. Roy Alonzo, Case No. 2:23-CR-00586-JAK, a single-defendant distribution of methamphetamine and possession of a firearm in furtherance of drug trafficking case, which has been pending since December 27, 2023, has been continued once, and is set for a three-to-four-day trial on July 23, 2024. It is unknown at this time whether the parties will seek a continuance.
- United States v. Bernhard Eugen Fritsch, Case No. 2:17-CR-00520-DSF, a single-defendant wire fraud case, which has been pending since August 17, 2017, has been continued twelve times, and is set for a 2-week trial on October 1, 2024. It



is not yet known whether a further continuance will be requested.

- United States v. Daniel Osmani Perez, Case No. 2:24-CR-00023-FMO, a single-defendant possession with intent to distribute methamphetamine case, which has been pending since January 11, 2024, has been continued one time, and is set for a three-to-four-day trial on November 12, 2024. It is not yet known whether a further continuance will be requested.
- United States v. Francisco Santos-Sweet, Case No. 5:18-CR-00316-TJH, a single-defendant kidnapping and transportation of a minor with intent to engage in sexual activity case, which has been pending since August 17, 2022, has been continued twice, and is set for a six-to-seven-day trial on January 28, 2025. It is not yet known whether a further continuance will be requested.